UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)	
IN RE PHARMACEUTICAL INDUSTRY)	MDL NO. 1456
AVERAGE WHOLESALE PRICE)	
LITIGATION)	CIVIL ACTION NO. 01-CV-12257-PBS
)	
)	Hon. Patti B. Saris
THIS DOCUMENT RELATES TO)	
ALL ACTIONS)	
)	

TRACK 1 DEFENDANTS' SECOND SUPPLEMENTAL AMENDED JOINT OFFERING DEPOSITION DESIGNATIONS (AND PLAINTIFFS' OBJECTIONS AND COUNTER DESIGNATIONS)

The Track 1 Defendants hereby present their second supplemental joint offering designations of the following depositions (which are highlighted in the transcripts in blue) and the Plaintiffs' objections and counter-designations (which are highlighted in the transcripts in pink).

11. Hal Goldman, Vista Healthplan

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	Sept. 20, 2004 Transcript:	
	21:22-27:9	
	40:2-41:9	
	62:22-65:18	
	76:18-79:22	
	112:20-114:8	
	118:5-119:13	
	133:21-134:7	

25. Eric Cannon, Intermountain Healthcare

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	September 13, 2004 Transcript:	
	58:12 - 60:10	

27. David Thomas, Three Rivers Health Plans

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	Sept. 24, 2004 Transcript:	
	48:18-50:11	
	57:14-61:11	
	62:2-13	
	64:18-65:9	
	66:11-68:6	
	74:22-80:20	
	84:19-85:11	
	103:2-15	
	106:7-21	
	114:4-9	
	119:13-120:12	
	123:11-19	
	129:11-20	

57. Edward Lemke, Humana of Louisville, KY

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	January 11, 2005 Transcript:	3
	100:22 – 102:17	
	106:13 – 18	
	122:8 – 123:8	

59. Dan Dragalin, Multiplan

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	Sept. 17, 2004 Transcript:	
	19:7-20	
	21:20-23:1	
	24:7-22	
	32:17-33:17	
	41:4-13	
	88:3-89:16	
	92:2-19	

74. William Einhorn, Teamsters Health and Welfare Fund

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	March 25, 2004 Transcript:	
	21:12-18	
	79:15-19	
	92:10-21	
	123:10-124:3	
	130:1-13	
	149:16-150:18	
	225:8-19	
	269:8-271:2	
	312:5-313:20	

William K. Ecklund, Twin Cities Bakery Workers Health and Welfare Plan 72.

Offering Party	Designation Range	Objection/Counter Designation
Track 1 Defendants	March 3, 2004 Transcript:	
	115:21 – 123:6	
	198:16 – 1199:1	

Dated: December 8, 2006

Respectfully submitted,

THE FOLLOWING TRACK 1 DEFENDANTS

By: /s/ William F. Cavanaugh, Jr.

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CERTIFICATE OF SERVICE BY LEXISNEXIS FILE & SERVE

Docket No. MDL 1456

I, Mark Young, hereby certify that I am one of the J&J Defendants' attorneys and that, on December 8, 2006, I caused copies of the TRACK 1 DEFENDANTS' SECOND SUPPLEMENTAL AMENDED JOINT OFFERING DEPOSITION DESIGNATIONS (AND PLAINTIFFS' OBJECTIONS AND COUNTER DESIGNATIONS) to be served on all counsel of record by causing same to be posted electronically via Lexis-Nexis File & Serve.

/s/	
Mark Young	